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November 30, 2021

VIA ECF

Hon. Paul G. Gardephe
United States District Court
Southern District of New York
500 Pearl Street, Room 2204
New York, NY 10007

Re: *Foster, et. al. v. City of New York*, Case No. 14-cv-4142-PGG

Dear Judge Gardephe:

I represent the Plaintiffs in the above-referenced case and write on behalf of both Parties to notify the Court that the Parties have reached a settlement in principle. The Parties are in the process of drafting a Settlement Agreement and, once finalized, the Parties will submit it to the Court for approval pursuant to *Cheeks v. Freeport Pancake House, Inc.*, 796 F.3d 199, 206 (2d Cir. 2015). Based on counsel's experience resolving similar FLSA matters in the past, the Parties do not anticipate disputes in connection with drafting or finalizing the Settlement Agreement or approval papers. Accordingly, the Parties will submit the Settlement Agreement for Court approval by no later than December 24, 2021.

Given the Parties' settlement in principle, the Parties also request that all deadlines for pre-trial filings, as well as the upcoming trial date, be vacated.

Thank you for the Court's attention to this matter.

Sincerely,

McGILLIVARY STEELE ELKIN LLP

A handwritten signature in black ink, appearing to be 'GKM' with a stylized flourish.

Gregory K. McGillivary

cc: All Counsel (via ECF)